

EXHIBIT 7

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March 28, 2025

Via Email

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Re: *In re Camp Lejeune – Proposed Expert Site Visit*

Counsel:

This is to confirm that at our scheduled meet and confer this afternoon, DOJ communicated its refusal to allow Dr. Sabatini access to the same facilities and people at Camp Lejeune that was provided to Dr. Hennes in Feb. 2025. The day after Dr. Hennes's deposition, counsel for Plaintiffs requested via the attached email that Dr. Sabatini be provided with access to Camp Lejeune to tour the Hadnot Point Water Treatment Plant (HP WTP) and other facilities and be allowed to interview HP WTP employees.

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During Dr. Hennet's deposition on March 20, Plaintiffs' counsel learned that during his Feb. 2025 site visit, Dr. Hennet interviewed numerous personnel who work at the HP WTP; reviewed data on monitors at the plant regarding various water levels and other data points; directed the taking of approximately 100 photographs of the site; directed, watched and timed the filling of a water buffalo; and took or directed the taking of numerous measurements of various parts of the HP WTP and other facilities. Two pages of notes of Dr. Hennet, which set forth his impressions from his site visit, were produced on February 25, 2025 along with approximately 100 photographs. During our meet and confer today, Mr. Anwar stated that Dr. Hennet's tour of Camp Lejeune in Feb. 2025 was conducted to "respond to the rebuttal report" of Dr. Sabatini. No such response is contemplated or allowed by the Federal Rules of Civil Procedure or this Court's orders.

It is Plaintiffs' position that Dr. Hennet's site visit, and all facts, data, impressions and opinions resulting from same, are in violation of the Federal Rules and this Court's orders. The visit occurred two months after Dr. Hennet's report was served, one month after Plaintiffs' rebuttal reports were served, and six months after fact discovery concluded for Phase I. During our meet and confer today, Plaintiffs' counsel offered to waive any objections they have to the Feb. 2025 site visit in exchange for Dr. Sabatini being permitted to tour the site in the same manner as Dr. Hennet, prior to Dr. Sabatini's April 11 deposition. DOJ declined this offer.

Very truly yours,

A handwritten signature in cursive script, reading "Laura J. Baughman". The signature is written in black ink on a light-colored background.

Laura J. Baughman

Baughman, Laura

From: Baughman, Laura
Sent: Friday, March 21, 2025 4:57 PM
To: Giovanni Antonucci; Adam Bain; Bridget Lipscomb; Haroon Anwar; Allison O'Leary; Alanna R. Horan; Kailey Silverstein; Iman Abdulle
Cc: Ed Bell; zina.bash; Dawn Bell; Kevin Dean; dhavai@motleyrice.com; Bolton, Devin
Subject: RE: CLJA - Request for Expert Access to HP WTP

Counsel:

In light of new facts and data disclosed during the deposition of Dr. Hennessey yesterday, along with his site visit to the Hadnot Point Water Treatment Plant (HP WTP) in Feb. 2025 (two months after his expert report was served in this case) and the DOJ's production on Feb. 25, 2025 of his notes and approximately 100 photographs regarding same, Plaintiffs request that, prior to his deposition, Dr. David Sabatini and counsel be provided with the same access to the HP WTP and other facilities as was provided to Dr. Hennessey, including the ability to converse with Hadnot Point treatment plant employees. We request that at least one spiractor be shut off and one be operating during this visit.

We look forward to your prompt reply in light of Dr. Sabatini's upcoming deposition.

Laura Baughman

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